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Charles Burnham (D.C. Bar# 1003464)*
Email: charles@burnhamgorokhov.com
BURNHAM & GOROKHOV PLLC
1424 K Street NW, Suite 500
Washington, D.C. 20005
Telephone: (202) 386-6920
* *admitted pro hac vice*

Attorneys for Plaintiff

**UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

JOHN C. EASTMAN,

Case No.: 22-56013

Plaintiff - Appellant,

vs.

BENNIE G. THOMPSON, *et al.*

Defendants - Appellees

**NOTICE OF LODGING AND LODGING OF DOCUMENTS
RELEVANT TO MOTION FOR STAY PENDING APPEAL**

Plaintiff-Appellant Dr. John Eastman, through undersigned counsel, hereby provides notice of lodging of 11 documents (Bates stamped Chapman060730, 60850, 61631, 61632, 61634, 61635, 61636, 61638, 61640, 61641, and 61648),

1 that were previously produced to the Government Defendant-Appellees, that are
2 relevant to the pending Motion for Stay Pending Appeal, and that are referenced in
3 the Declaration of John C. Eastman that has been filed *in camera* and under seal.

4 The documents are attached hereto as Exhibit A.

5
6
7 October 31, 2022.

8 Respectfully submitted,

9 /s/ Anthony T. Caso
10 Anthony T. Caso (Cal. Bar #88561)
11 CONSTITUTIONAL COUNSEL GROUP
12 174 W Lincoln Ave # 620
13 Anaheim, CA 92805-2901
14 Phone: 916-601-1916
15 Fax: 916-307-5164
16 Email: atcaso@ccg1776.com

17 Charles Burnham (D.C. Bar# 1003464)*
18 Email: charles@burnhamgorokhov.com
19 BURNHAM & GOROKHOV PLLC
20 1424 K Street NW, Suite 500
21 Washington, D.C. 20005
22 Telephone: (202) 386-6920
23 * *pro hac vice motion forthcoming*

Exhibit A

11 Documents Previously Produced to Select Committee

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

DONALD J. TRUMP, in his capacity)
as Candidate for President,)
DONALD J. TRUMP FOR)
PRESIDENT, INC., and)
DAVID SHAFER, in his capacity as a)
Registered Voter and)
Presidential Elector pledged to)
Donald Trump for President,)

Petitioners,)

CIVIL ACTION FILE NO. _____

v.)

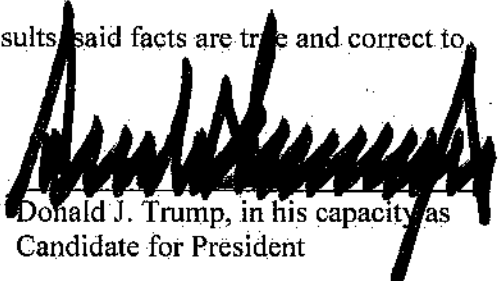
BRAD RAFFENSPERGER,)
in his official capacity as Secretary of)
State of Georgia, *et al.*,)

Respondents.)

CITY OF WASHINGTON
DISTRICT OF COLUMBIA

VERIFICATION

Personally appeared before me, an officer duly authorized by law to administer oaths, Donald J. Trump, in his capacity as Candidate for President of the United States, who after first being duly sworn, states that, based upon the affidavits and expert testimony attesting to the facts contained in the within and foregoing Petition to Contest Election Results, said facts are true and correct to the best of my knowledge and belief.


Donald J. Trump, in his capacity as
Candidate for President

Sworn to and subscribed before me this 15th day of December, 2020



William M. Cathers 12/1/2020
NOTARY PUBLIC

My Commission Expires: 1/31/2022.

From: Herschmann, Eric (YouMail) <voicemail@youmail.com>
Sent: Thursday, December 31, 2020 12:49 PM MST
To: Eastman, John <jeastman@chapman.edu>
Subject: Missed Call from Herschmann, Eric at [REDACTED] 4730

External Message

Help friends block robocalls
[LEARN MORE](#)

Herschmann, Eric

[REDACTED] 4730

No message left

called [REDACTED] 9983

Thu Dec 31, 2020 11:49 AM PST

[BLOCK CALLER](#)

[ADD NEW CONTACT](#)

[VIEW MORE INFO](#)

This email was sent by YouMail. Want to disable all voicemail or call alerts from us?

[Unsubscribe](#) | [Settings](#) | [Help](#)

43 Corporate Park, Suite 200, Irvine, CA 92606 US
YouMail respects your privacy. Please review our [Privacy Policy](#) and [Terms of Use](#).

NOTE: This email originated from outside Chapman's network. Do not click links or open attachments unless you recognize the sender and know content is safe.

From: Michael, Molly A. EOP/WHO <Molly.A.Michael@who.eop.gov>
Sent: Thursday, December 31, 2020 8:19 PM MST
To: cmitchell@foley.com <cmitchell@foley.com>; Eastman, John <jeastman@chapman.edu>
CC: Herschmann, Eric D. EOP/WHO <Eric.D.Herschmann@who.eop.gov>
Subject: Signed Document
Attachment(s): "[Untitled].pdf"

External Message

Attached

Sent from my iPhone

NOTE: This email originated from outside Chapman's network. Do not click links or open attachments unless you recognize the sender and know content is safe.

**IN THE UNITED STATES DISTRICT COURT
NORTHERNDISTRICT OF GEORGIA
Atlanta Division**

DONALD J. TRUMP, in his capacity as
a candidate for President of the United
States,

Plaintiff,

v.

BRIAN P. KEMP, in his official capacity
as Governor of the State of Georgia;
BRAD RAFFENSPERGER, in his official
capacity as Georgia Secretary of State,

Defendants.

CIVIL ACTION FILE NO:

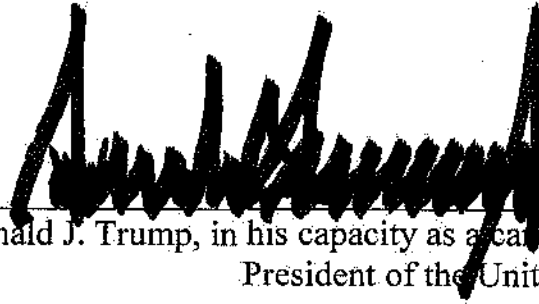
WASHINGTON

DISTRICT OF COLUMBIA

**VERIFICATION IN SUPPORT OF COMPLAINT FOR EMERGENCY
INJUNCTIVE AND DECLARATORY RELIEF**

Personally appeared before me, a Notary Public, duly authorized by law to administer oaths, President Donald J. Trump, solely in his capacity as a candidate for President of the United States, who on oath says he has reviewed the Verified Complaint for Emergency Injunctive And Declaratory Relief and with regard to the facts contained therein, states that to the best of his knowledge and belief, and relying on the representations contained therein, the facts are true and correct where derived

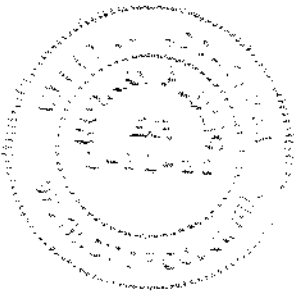
from his own knowledge and are believed to be true and correct where derived from the knowledge of others or from documents that are maintained in the course of business or are public records.



Donald J. Trump, in his capacity as a candidate for
President of the United States,
Plaintiff

 12/31/2020
Notary Public

My Commission Expires 1/31/2022
(SEAL)



From: Eastman, John

Sent: Thursday, December 31, 2020 8:30 PM MST

To: Michael, Molly A. EOP/WHO <Molly.A.Michael@who.eop.gov>; cmitche@foley.com <cmitche@foley.com>

CC: Herschmann, Eric D. EOP/WHO <Eric.D.Herschmann@who.eop.gov>

Subject: RE: Signed Document

Thank you!

Happy New Year!

John

From: Michael, Molly A. EOP/WHO <Molly.A.Michael@who.eop.gov>

Sent: Thursday, December 31, 2020 8:19 PM

To: cmitche@foley.com; Eastman, John <jeastman@chapman.edu>

Cc: Herschmann, Eric D. EOP/WHO <Eric.D.Herschmann@who.eop.gov>

Subject: Signed Document

External Message

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NOTE: This email originated from outside Chapman's network. Do not click links or open attachments unless you recognize the sender and know content is safe.

From: Eastman, John
Sent: Thursday, December 31, 2020 8:31 PM MST
To: CMitchell@foley.com <cmitchell@foley.com>; Kurt Hilbert <khilbert@hilbertlaw.com>; Alex B. Kaufman <AKaufman@foxrothschild.com>
Subject: FW: Signed Document
Attachment(s): "[Untitled].pdf"

Here it is!!

Let me know if there is still anyone around to file it.

And Happy New Year, everyone.

John

From: Michael, Molly A. EOP/WHO <Molly.A.Michael@who.eop.gov>
Sent: Thursday, December 31, 2020 8:19 PM
To: cmitchell@foley.com; Eastman, John <jeastman@chapman.edu>
Cc: Herschmann, Eric D. EOP/WHO <Eric.D.Herschmann@who.eop.gov>
Subject: Signed Document

External Message

Attached

Sent from my iPhone

NOTE: This email originated from outside Chapman's network. Do not click links or open attachments unless you recognize the sender and know content is safe.

**IN THE UNITED STATES DISTRICT COURT
NORTHERNDISTRICT OF GEORGIA
Atlanta Division**

DONALD J. TRUMP, in his capacity as
a candidate for President of the United
States,

Plaintiff,

v.

BRIAN P. KEMP, in his official capacity
as Governor of the State of Georgia;
BRAD RAFFENSPERGER, in his official
capacity as Georgia Secretary of State,

Defendants.

CIVIL ACTION FILE NO:

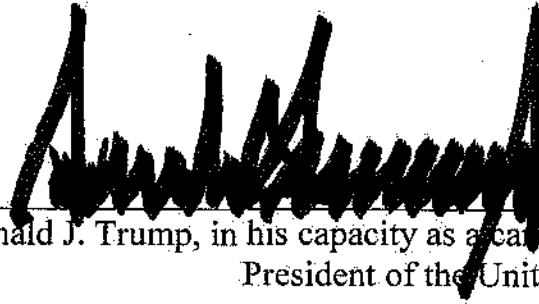
WASHINGTON

DISTRICT OF COLUMBIA

**VERIFICATION IN SUPPORT OF COMPLAINT FOR EMERGENCY
INJUNCTIVE AND DECLARATORY RELIEF**

Personally appeared before me, a Notary Public, duly authorized by law to administer oaths, President Donald J. Trump, solely in his capacity as a candidate for President of the United States, who on oath says he has reviewed the Verified Complaint for Emergency Injunctive And Declaratory Relief and with regard to the facts contained therein, states that to the best of his knowledge and belief, and relying on the representations contained therein, the facts are true and correct where derived

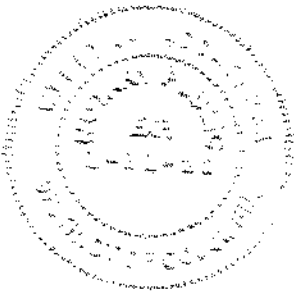
from his own knowledge and are believed to be true and correct where derived from the knowledge of others or from documents that are maintained in the course of business or are public records.



Donald J. Trump, in his capacity as a candidate for
President of the United States,
Plaintiff

William McBethan 12/31/2020
Notary Public

My Commission Expires 1/31/2022
(SEAL)



From: Kaufman, Alex B. <AKaufman@foxrothschild.com>
Sent: Thursday, December 31, 2020 8:35 PM MST
To: Eastman, John <jeastman@chapman.edu>
CC: cmitchell@foley.com <cmitchell@foley.com>; Kurt Hilbert <khilbert@hilbertlaw.com>
Subject: Re: [EXT] FW: Signed Document

Will do!

Alex Kaufman
Partner
Fox Rothschild LLP
[999 Peachtree Street NE](#)
[Suite 1500](#)
[Atlanta, GA 30309](#)
[\(404\) 870-3769](#) – direct
[\(404\) 964-5587](#) - cell
[\(404\) 962-1200](#) - fax
AKaufman@foxrothschild.com
www.foxrothschild.com
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To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (1) avoiding penalties under the Internal Revenue Code or (2) promoting, marketing or recommending to another party any transaction or matter addressed herein.

On Dec 31, 2020, at 10:31 PM, Eastman, John <jeastman@chapman.edu> wrote:

Here it is!!

Let me know if there is still anyone around to file it.

And Happy New Year, everyone.

John

From: Michael, Molly A. EOP/WHO <Molly.A.Michael@who.eop.gov>
Sent: Thursday, December 31, 2020 8:19 PM
To: cmitchell@foley.com; Eastman, John <jeastman@chapman.edu>
Cc: Herschmann, Eric D. EOP/WHO <Eric.D.Herschmann@who.eop.gov>
Subject: Signed Document

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<[Untitled].pdf>

This email contains information that may be confidential and/or privileged. If you are not the intended recipient, or the employee or agent authorized to receive for the intended recipient, you may not copy, disclose or use any contents in this email. If you have received this email in error, please immediately notify the sender at Fox Rothschild LLP by replying to this email and delete the original and reply emails. Thank you.

From: Kurt Hilbert <khilbert@hilbertlaw.com>
Sent: Thursday, December 31, 2020 8:37 PM MST
To: Eastman, John <jeastman@chapman.edu>
CC: CMitchell@foley.com <CMitchell@foley.com>; Alex B. Kaufman <AKaufman@foxrothschild.com>
Subject: Re: Signed Document

Will be filed tonight.

Happy New Year to all!!

Kurt

Sent from my iPhone

On Dec 31, 2020, at 10:31 PM, Eastman, John <jeastman@chapman.edu> wrote:

Here it is!!

Let me know if there is still anyone around to file it.

And Happy New Year, everyone.

John

From: Michael, Molly A. EOP/WHO <Molly.A.Michael@who.eop.gov>
Sent: Thursday, December 31, 2020 8:19 PM
To: cmitchell@foley.com; Eastman, John <jeastman@chapman.edu>
Cc: Herschmann, Eric D. EOP/WHO <Eric.D.Herschmann@who.eop.gov>
Subject: Signed Document

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<[Untitled].pdf>

From: Eastman, John
Sent: Thursday, December 31, 2020 8:47 PM MST
To: Kurt Hilbert <khilbert@hilbertlaw.com>
CC: CMitchell@foley.com <CMitchell@foley.com>; Alex B. Kaufman <AKaufman@foxrothschild.com>
Subject: Re: Signed Document

Great. Send me confirmation as soon as filed and I'll get the Pennsylvania reply filed.

John

Dr. John C. Eastman
Chapman University School of Law
[REDACTED] 3330 x2

(Sent from my mobile device. Please excuse any typos or brevity.)

On Dec 31, 2020, at 9:37 PM, Kurt Hilbert <khilbert@hilbertlaw.com> wrote:

Will be filed tonight.

Happy New Year to all!!

Kurt

Sent from my iPhone

On Dec 31, 2020, at 10:31 PM, Eastman, John <jeastman@chapman.edu> wrote:

Here it is!!

Let me know if there is still anyone around to file it.

And Happy New Year, everyone.

John

From: Michael, Molly A. EOP/WHO <Molly.A.Michael@who.eop.gov>
Sent: Thursday, December 31, 2020 8:19 PM
To: cmitchell@foley.com; Eastman, John <jeastman@chapman.edu>
Cc: Herschmann, Eric D. EOP/WHO <Eric.D.Herschmann@who.eop.gov>
Subject: Signed Document

External Message

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Sent from my iPhone

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<[Untitled].pdf>

From: Kurt Hilbert <khilbert@hilbertlaw.com>
Sent: Thursday, December 31, 2020 9:18 PM MST
To: Eastman, John <jeastman@chapman.edu>; Cleta Mitchell <CMitchell@foley.com>
CC: Alex B. Kaufman <AKaufman@foxrothschild.com>; Chris Gardner <chris@chrisgardnerlaw.com>; Craig Turner <cturner@foxrothschild.com>
Subject: Fwd: Pay.gov Payment Confirmation: GEORGIA NORTHERN DISTRICT COURT

External Message

To all:

Receipt from
Filing below.

Will circulate case no. when received.

Kurt

Sent from my iPhone

Begin forwarded message:

From: DO_NOT_REPLY@psc.uscourts.gov
Date: December 31, 2020 at 11:01:09 PM EST
To: khilbert@hilbertlaw.com
Subject: Pay.gov Payment Confirmation: GEORGIA NORTHERN DISTRICT COURT
Reply-To: GANDdb_efile_Financial@gand.uscourts.gov

Your payment has been successfully processed and the details are below. If you have any questions or you wish to cancel this payment, please contact: Kathy Sewell at 404-215-1625.

Account Number: 3504931
Court: GEORGIA NORTHERN DISTRICT COURT
Amount: \$402.00
Tracking Id: AGANDC-10554533
Approval Code: 156125
Card Number: *****2004
Date/Time: 12/31/2020 11:01:05 ET

NOTE: This is an automated message. Please do not reply

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CERTIFICATE OF SERVICE

I have served this filing on all counsel through the Court's ECF system.

Respectfully submitted,

/s/Anthony T. Caso

Anthony T. Caso (Cal. Bar #88561)

CONSTITUTIONAL COUNSEL GROUP

174 W Lincoln Ave # 620

Anaheim, CA 92805-2901

Phone: 916-601-1916

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Email: atcaso@ccg1776.com